BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO PUBLIC REPRESENTATIVE INTERROGATORIES (PR/USPS-T4-4(a-e) AND 5)**
(February 15, 2012)

The United States Postal Service files the responses of witness Neri (USPS-T-4)

to the above-listed interrogatories of the Public Representative dated January 31, 2012.

Each interrogatory is stated verbatim and followed by the response. Interrogatory

PR/USPS-T4-4(h) has been redirected to Postal Service witness Bratta (USPS-T-5) for

a response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

James M. Mecone

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-6525; Fax -5402
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**PR/USPS-T-4-4**

In questions PR/USPS-T-4-1 (b) you were asked to provide "empirical evidence illustrating 'excess capacity' for the mail processing network", the supporting calculations and data. In your response to PR/USPS-T-4-1 (b) you refer to USPS-LR-N2012-1/44.

      a.     Please, confirm that data provided in the worksheet 'Data' are extracted from MODS database or calculated using data from the MODS database.  If not confirmed, please, provide the source of the data.  Also please provide all formulas that were used to calculate data provided in the fields in worksheet 'Data'.

      b.     Please, provide the description of the fields (SumOfMach_cnt, SumOfRun Time, etc) in worksheet 'Data'.

      c.     Records provided in the worksheet data refer to a one year period from October 1, 2010 to September 30, 2011. Have you made any comparative calculations for the prior years?

      d.     Please explain why Down Time is included as part of Processing Time, and how it differs from Idle Time?

      e.     Please confirm that the difference between Window Time and Operating Time is time a machine is not down and not idle. If confirmed, please explain whether the Postal Service has a term for this amount of time, and please provide the name of the term (and definition, if different from the above description).

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**RESPONSE:**

a.  Not confirmed.  The data on the data tab is an extract from the WebEOR (End of Run) system.  For formulas, see response to subpart b below.

b.  Data columns are as defined below:

      a.  (Untitled) – This is an index used to provide summarized data on the Summary tab.  The formula used is a concatenation of the data in columns D and B.

      b.  Machine – This is the machine acronym.

      c.  ModsDate – This is the MODS date (0700-0659) that the data was pulled from.

      d.  DOW – This is the 3 character abbreviation for the weekday of the MODS date.

**RESPONSE to PR/USPS-T4-4 (continued):**

    e.  SumOfMach_cnt – This is a count of the distinct machines (by type in column B) that ran on the MODS date (in column C).

    f.  SumOfRun Time – This is the number of hours that the machines (by type in column B) ran, as reported by the machine, on the MODS date (in column C).  Run time is the time, during a processing run, when the machine is actively moving mail through the transport system.

    g.  SumOfDown Time - This is the number of hours that the machines (by type in column B) were down, as reported by the machine, on the MODS date (in column C).  Down time is the time, during a processing run, when the machine is not able to run due to some maintenance type event (jam, e-stop, etc).

    h.  SumOfOper Time - This is the number of hours that the machines (by type in column B) were in a processing run, as reported by the machine, on the MODS date (in column C).  Operational time is defined to be the difference between the time stamps (Start of Run and End of Run) reported by the machine.

    i.  SumOfIdleTime – This is the number of hours that the machines (by type in column B) were idle on the MODS date (in column C). Idle time is a calculation using the following formula: SumOfOper_Time minus SumOfRun_Time minus SunOfDown_Time.  This represents the time that the machine is available, during a processing run, but not being actively used.

    j.  % idle – This is the percentage of the Oper Time that is being recorded as Idle Time.  It is a calculation using the following formula: SumOfIdleTime divided by SumOfOper_Time.

    k.  SumOfWindow – This represents the available window, in hours, that the machines (by type in column B) were potentially available on the MODS date (in column C).  It is a calculation using the following formula:  SumOfMach_cnt times 20.

    l.  Pct Oper – This is the percentage of the available window that the machines (by type in column B) were in a processing run on the MODS date (in column C).  It is a calculation using the following formula: SumOfOper_Time divided by SumOfWindow.

**RESPONSE to PR/USPS-T4-4 (continued):**

    m. SumOfProcessing – This is the total time that the machines (by type in column B) were actively being used to process mail on the MODS date (in column C). It is a calculation using the following formula: SumOfRun_Time plus SumOfDown_Time.

    n. Pct Processing – This is the percentage of the available window the machines (by type in column B) were actively processing mail on the MODS date (in column C). This is a calculation using the following formula: SumOfProcessing divided by SumOfWindow.

c. No other comparative calculations have been made.

d. Down time is included as part of processing time because it occurs during the active run as a result of using the machine to process mail. Down time that happens outside of the processing run (e.g. major part replacement) is not reported as down time in this analysis. Down time differs from idle time in the nature of the event causing the machine to not run.

e. Not confirmed.

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**PR/USPS-T-4-5**

Please refer to LR-USPS-N2012-1/45- Materials Responsive to PR USPS-T4-3,
LR45(Neri).xls.

   a. Please confirm that witness Bradley calculated the reduction of in-plant
      support using USPS-LR-20, Create MODS Hours File.Sas and his
      knowledge of which finance numbers would be discontinued in the
      realigned network?
   b. If confirmed, please explain how this file was used in the proposed
      network realignment.  Please identify any and all calculations or data
      cells that were used as inputs into other files submitted by the Postal
      Service, and identify those files.

**RESPONSE:**

a. Confirmed

b. This file was utilized to estimate the aggregate percent reduction of in plant

support.